

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

LOCAL, 8027 AFT-NEW HAMPSHIRE,)
AFL-CIO, et al.,)
Plaintiffs,)
v.) Case No. 1:21-cv-1077-PB
FRANK EDELBLUT, in his official)
capacity only as the Commissioner)
of the New Hampshire Department)
of Education, et al.,)
Defendants.)

SECOND ASSENTED-TO MOTION TO EXTEND ANSWER DEADLINES

The defendants, by and through the Office of the Attorney General, submit the following second assented-to motion to extend their answer deadlines in this case:

1. On January 27, the Court granted the defendants' first assented-to motion to extend their deadlines to answer the plaintiffs' complaints. Jan. 27, 2023 Endorsed Order. The current answer deadlines are February 9.
2. The defendants request a further extension of these deadlines to February 14. The defendants again make this request due to undersigned counsel's competing litigation obligations over the past two weeks, which have required an unanticipated amount of time and attention. The Department of Justice is working diligently to finalize answers to the complaints and anticipates having them ready to file on or before February 14, which will ensure that the plaintiffs and the Court have them before the February 15 pretrial conference.
3. Counsel for the plaintiffs assent to the requested extension.

4. The requested extension will not result in the continuance of any hearing, conference, or trial. LR 7.2(a).

5. No memorandum accompanies this motion because the reasons for the requested relief are all stated above. LR 7.1(a)(1).

WHEREFORE, the defendants respectfully request that this Honorable Court:

- A. Further extent their answer deadlines to February 14; and
- B. Grant such other relief as the Court deems just and equitable.

Respectfully submitted,

FRANK EDELBLUT, in his official capacity as Commissioner of the Department of Education,

JOHN M. FORMELLA, in his official capacity only as Attorney General of the State of New Hampshire,

AHNI MALACHI, in her official capacity as Executive Director of the Commission for Human Rights,

CHRISTIAN KIM, in his official capacity as Chair of the Commission for Human Rights,

and

KENNETH MERRIFIELD, in his official capacity as Commissioner of the Department of Labor

By their attorney,

**JOHN M. FORMELLA
ATTORNEY GENERAL**

Date: February 9, 2023

/s/ Samuel Garland
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Certificate of Service

I hereby certify that a copy of the foregoing was served on all counsel of recording using the Court's electronic-filing service.

/s/ Samuel Garland
Samuel R.V. Garland